

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DAWN ELIZABETH PARKS : CASE NO. 5-13-06057
Debtor. :

WILMINGTON TRUST, NATIONAL :
ASSOCIATION, NOT IN ITS :
INDIVIDUAL CAPACITY BUT SOLEY :
AS TRUSTEE FOR MFRA TRUST 2014-2 :
Movant, :

vs. :
DAWN ELIZABETH PARKS :
Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Dawn Parks, the Debtor, and files an Answer to Wilmington trust,
NA's Motion for Relief From the Automatic Stay:

1. Dawn Parks, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if said payments were made and/or if Debtor is in possession of the funds needed to cure the alleged default.
4. Debtor has been making payments to the Movant. However, the payments increased due to an escrow shortage. The Debtor can not afford the increased payments, therefore, she has not been making the full amount. Debtor wishes to include any arrears including escrow shortage in an amended Plan.

5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: February 13, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 13, 2017, he caused a true and correct copy
of Debtor's Answer to Wilmington Trust's Motion for Relief from the Automatic Stay to be served
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James Warmbrodt, Esq at jwarmbrodt@kmlawgroup.com

Dated: February 13, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire